

## Green, Margaret

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**From:** Linda French <Linda.French@mottmac.com>  
**Sent:** Friday, September 04, 2020 8:47 AM  
**To:** Green, Margaret  
**Cc:** Christopher Henry; 'drowe@msank.org'  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Ok, the recalculated limit of 0.0510 mg/l for mercury is requested.

Thanks.

### Linda French

Project Scientist

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**From:** Green, Margaret <green.margaret@epa.gov>  
**Sent:** Friday, September 4, 2020 8:40 AM  
**To:** Linda French <Linda.French@mottmac.com>  
**Cc:** Christopher Henry <Christopher.Henry@mottmac.com>; 'drowe@msank.org' <drowe@msank.org>  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Apologies, I apparently neglected to notice my typo, the recalculated limit was 0.0510 mg/L. If this recalculated limit is one you wish to propose let me know.

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**From:** Linda French <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>  
**Sent:** Friday, September 04, 2020 8:38 AM  
**To:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>  
**Cc:** Christopher Henry <[Christopher.Henry@mottmac.com](mailto:Christopher.Henry@mottmac.com)>; 'drowe@msank.org' <[drowe@msank.org](mailto:drowe@msank.org)>  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Yes, the amended mercury limit of 0.01510 mg/l is requested.

Thanks.

### Linda French

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**From:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>  
**Sent:** Friday, September 4, 2020 8:03 AM  
**To:** Linda French <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>  
**Cc:** Christopher Henry <[Christopher.Henry@mottmac.com](mailto:Christopher.Henry@mottmac.com)>; 'drowe@msank.org' <[drowe@msank.org](mailto:drowe@msank.org)>  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Thanks Linda. Due to the adjustment, the limit for mercury was recalculated to 0.01510 mg/L from 0.03. Does the Authority wish to amend this proposed limit as well?

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**From:** Linda French <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>  
**Sent:** Friday, September 04, 2020 7:50 AM  
**To:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>  
**Cc:** Christopher Henry <[Christopher.Henry@mottmac.com](mailto:Christopher.Henry@mottmac.com)>; 'drowe@msank.org' <[drowe@msank.org](mailto:drowe@msank.org)>  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Hi Maggie,

The correct reference should have been Table 1 of Chapter 271.914 and the correct value for mercury should have been 57 mg/kg. The previous submission's value for mercury was a typo. Sorry for the confusion.

Thanks.

**Linda French**

Project Scientist

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**From:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>  
**Sent:** Thursday, September 3, 2020 4:05 PM  
**To:** Linda French <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>  
**Cc:** 'drowe@msank.org' <[drowe@msank.org](mailto:drowe@msank.org)>; Christopher Henry <[Christopher.Henry@mottmac.com](mailto:Christopher.Henry@mottmac.com)>  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Hi Linda,

Thank you for resubmitting the updated analysis. I have a couple minor notations that I want to confirm with you before I accept. You reference PA Code 25 Chapter 503.13, when in fact I think you mean to reference Table 1 of chapter 271.914 Pollutant Limits in the PA Code (which references 40 CFR 503.13). Second, you used 37 mg/kg for mercury when the code indicates 57 mg/kg as the ceiling concentration, is there a reason for this discrepancy or is it a typo?

Thanks,

Maggie

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**From:** Linda French <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>  
**Sent:** Monday, August 24, 2020 9:24 AM  
**To:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>  
**Cc:** 'drowe@msank.org' <[drowe@msank.org](mailto:drowe@msank.org)>; Christopher Henry <[Christopher.Henry@mottmac.com](mailto:Christopher.Henry@mottmac.com)>  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Hi Maggie,

Thank you for your input on the local limitation calculations applicable to the Municipal Sanitary Authority of New Kensington. The Authority does not land apply their sludge therefore it has been decided to revise the cumulative loading sludge values listed in Table 14

of the spreadsheet to the ceiling concentrations listed in Table 1 of 25 PA Code, Chapter 503.13. The limits now requested for approval have also been added to Table 19 of the spreadsheet.

If you need any further information, please let me know.

Thanks.

**Linda French**

Project Scientist

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**From:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>  
**Sent:** Tuesday, July 28, 2020 7:21 PM  
**To:** Linda French <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Hi Linda,

Thank you for resubmitting.

Thank you for addressing all my comments. One last question. A number of the limits were re-calculated based on the changes. Can you please review the proposed limits versus the calculated limits and determine what should be proposed?

In addition, a number of the pollutants basis for limitation is sludge, remind me, does New Kensington land apply sludge?

Thanks,

Maggie

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**From:** French, Linda <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>  
**Sent:** Tuesday, June 30, 2020 9:20 AM  
**To:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>  
**Cc:** 'drowe@msank.org' <[drowe@msank.org](mailto:drowe@msank.org)>; Henry, Christopher <[Christopher.Henry@mottmac.com](mailto:Christopher.Henry@mottmac.com)>; [ldl@gllawyers.com](mailto:ldl@gllawyers.com)  
**Subject:** RE: Pretreatment - PA0027111 New Kensington Local Limits Review

Hi Maggie,

Please see attached response documents based on your comments on the MSANK Headworks Analysis. Please let us know if you have any questions or require additional information.

Thanks.

**Linda French**

Project Scientist

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**From:** Green, Margaret <[green.margaret@epa.gov](mailto:green.margaret@epa.gov)>

**Sent:** Friday, June 12, 2020 1:11 PM

**To:** French, Linda <[Linda.French@mottmac.com](mailto:Linda.French@mottmac.com)>; 'drowe@msank.org' <[drowe@msank.org](mailto:drowe@msank.org)>

**Cc:** [sefurjanic@pa.gov](mailto:sefurjanic@pa.gov); Kriley, Christopher <[ckriley@pa.gov](mailto:ckriley@pa.gov)>

**Subject:** Pretreatment - PA0027111 New Kensington Local Limits Review

**Daniel Rowe**

**Manager**

**Municipal Sanitary Authority for the City of New Kensington**

**120 Logans Ferry Road**

**New Kensington, Pennsylvania 15068-2046**

**Re: Industrial Pretreatment Program –Local Limits Review**

Dear Mr. Rowe,

I have completed my review of the Authority's headworks analysis submitted on April 3, 2019. Based on this review, changes will be needed to the submission prior to approval as indicated in my comments below. Enclosed is a printout of a spreadsheet (version 5.3) used to calculate local limits in which the data inputs are revised as discussed below. This printout is not intended to be used by the Authority directly, but is only included as an indication of the effect of the changes based on my comments.

The electronic spreadsheet submitted by the Authority seemed to have an error in the coding on the monitoring sheet. All data was showing up red bolded, indicating that all data submitted were outliers to the data set. Because of this, I re-entered the data into a new spreadsheet and manually removed outliers and adjusted the data as described below and in our instructions on how to use the spreadsheet (see attached).

The Authority had indicated in their sampling plan that they would also be evaluating for hexavalent chromium and oil & grease. The Authority failed to evaluate for these pollutants in this submission. Please include an analysis of these two pollutants in the re-submission.

Based on the changes I made to the handling of the influent, effluent, and sludge monitoring data, the removal rates used in the local limits calculations were revised. In addition, the Authority's selection of the removal rate used in the evaluation was reviewed and revised in some cases. The recommended selection of removal rate for each pollutant is shown in the "Select Removal Efficiency" column in Table 3 of the enclosed worksheet. In general, where actual influent, effluent and sludge data that were not reported as non-detectable were available, a removal based on the average influent, the average effluent or average sludge was selected. The enclosed worksheet changes the Authority's selection of removal to the influent/effluent removal for selenium, silver and zinc and to influent/sludge removal for mercury. Please review the changes to the spreadsheet and affirm that they are indicative of plant conditions.

In regards to cyanide, a negative removal efficiency was calculated in the spreadsheet and was based on a number of undetectable data. The Authority should ensure detectable data for this pollutant in all future submissions in order to calculate a representative removal efficiency. Should the Authority have updated data to

recalculate the removal efficiency for cyanide, please include it in the resubmission. As it stands, the default removal efficiency chosen is acceptable.

The Authority needs to clarify the user entered removal efficiency for selenium (3.2413793)? I was unable to locate justification for this value and therefore chose the default activated sludge removal efficiency for selenium in my review.

Limits Calculation Sheet:

Table 2b – I could not locate where the Authority sourced their hardness value. Please provide justification for the value chosen.

Table 3 – Please review changes to chosen removal efficiencies and verify whether these are indicative of plant conditions. As well, the Authority did not include the permit limit for TSS in Table 3; I have added it herein.

Table 11 – Does hauled waste discharged to sludge processing units flow through digesters needs to be answered by the Authority, please indicate the Authority's response with an X in the appropriate yellow cell above Table 11.

Table 13 – The Authority needs to indicate whether the POTW experienced inhibition or construction during this time. Please indicate this with an X in the appropriate yellow cell above Table 13.

Table 19 – The Authority needs to indicate whether they will be adopting uniform concentration limits or the maximum allowable industrial loadings. Please indicate this with an X in the appropriate yellow cell above Table 19. The Authority may also choose to adopt a combination of uniform concentration limits and loadings; should this be the route the Authority wishes to take, please indicate that in your re-submission.

Based on the changes made to the spreadsheet, the limits in Table 19 were re-calculated. The Authority should review the revisions and propose new limits where appropriate.

The Authority will need to revise its submission based on the comments above. Please provide a response to the issues raised above, as well as a revised limits reevaluation as appropriate. Should you have any questions or concerns do not hesitate to get in touch with me.

Best,

Maggie Green

**Margaret Green**

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